

# EXHIBIT 3



**U.S. Department of Justice**  
Civil Division, Torts Branch  
Environmental Torts

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*Cindy Hurt, Trial Attorney*  
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**VIA EMAIL**

July 19, 2024

Lead Counsel for Plaintiffs  
& Co-Lead Counsel for Plaintiffs

**Re: *Camp Lejeune Water Litigation – Notices of Deposition***

Counsel:

I am writing to inform you that the United States objects to the document request included in Plaintiffs' Notices of Deposition to the following current and former employees of the United States.

Plaintiffs issued Notices of Deposition for the following individuals who are current or former employees of the United States:

1. Frank Bove
2. Ron Burke
3. James Hatcher
4. Tim Mall[o]n
5. Justin Ramsey
6. Christopher Re[h]
7. Chris Rennix
8. Jason Sautner
9. Rene Suarez-Soto
10. Dan Waddill
11. Scott Williams

Each of these Notices of Deposition contains the following document request ("Document Request"):

All relevant documents (including hard copies), emails, native files, PowerPoints, research materials, spreadsheets, maps, diagrams, working drafts, memoranda, communications, notes and any other file materials contained on any computer storage device on which you saved working materials or files, regardless if an office computer or personal computer, related to Camp Lejeune water contamination issues.

This Request is substantially similar to the request included in Plaintiffs' Seventh Request for Production of Documents (Seventh RFP):

After interviewing the below government employees, please identify and produce all relevant documents (including hard copies), emails, native files, power-points, research materials, spreadsheets, maps, diagrams, working drafts, memorandums, communications, notes and any other file materials contained on any computer storage device these employees saved their working materials or these files, regardless if an office computer or personal laptop/home computer, related to Camp Lejeune Water Contamination issues

The United States asserts the same Objections and Responses it issued as to the Seventh RFP over the Document Request. Namely, Plaintiffs are seeking an overly broad, burdensome search for ESI that is in contradiction to the Parties' prior agreements. This is particularly true for the individuals who work for the ATSDR, given the Parties' agreement pertaining to the production of the Health Effects Studies and Water Modeling Project Files. And Plaintiffs have not articulated with any particularity why these searches are necessary, or even likely, to produce relevant or non-duplicative information related to either general or specific causation (especially given the almost 19 million pages already produced).

Subject to, and without waiving these objections, the United States is producing non-privileged emails to and from Dr. Frank Bove related to Camp Lejeune (including attachments). The first production of these documents was made on June 25, 2024, with bates numbers CLJA\_ATSDR\_BOVE-0000000001-111803. The United States will also be producing "hard copy documents" that were in Dr. Bove's custody, possession, and control in accordance with the ESI Protocol (CMO No. 8).

Subject to, and without waiving these objections, the United States produced non-privileged emails to and from Chris Rennix related to Camp Lejeune (including attachments). The United States has also produced additional ESI already collected from Dr. Rennix's files. This production was made in accordance with the ESI Protocol (CMO No. 8) on July 10, 2024, with bates numbers RENNIX\_0000000001 - RENNIX\_0000036993.

In addition, and without waiving these objections, the United States is making "hard copy documents" related to Camp Lejeune in Scott Williams's custody, possession, and control available for Plaintiffs' inspection at an agreed-upon date and time. The United States will also be producing "hard copy documents" that are in Dan Waddill's custody, possession, and control in accordance with the ESI Protocol (CMO No. 8). Pursuant to the Federal Rules of Civil Procedure, the United States is also investigating whether any other deponent has any "hard copy documents" in their custody, possession, or control related to Camp Lejeune and will inform Plaintiffs of any such documents if and when additional information becomes available.

Best Regards,

/s/Cindy M. Hurt

Cindy M. Hurt

Trial Attorney

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